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October 17, 2022

MEMO ENDORSED

VIA ECF

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

OK  
Colleen McMahon  
10/17/22

Re: *United States v. Joseph Bailey*  
19 Cr. 412 (CM)

Dear Judge McMahon:


We represent the defendant, Joseph Bailey, in the above-referenced matter. We are writing to request the Court's permission for Mr. Bailey to travel to Israel between November 16 and December 2, 2022. We are advised by Assistant United States Attorney Dina McLeod that the government has no objection to this request.

Mr. Bailey pleaded guilty to one count of violating 18 USC 1349 (conspiracy to commit wire fraud) on January 15, 2020. Mr. Bailey was sentenced by the Court on December 22, 2020 to a term of imprisonment of six months, followed by a term of supervised release of three years. Mr. Bailey surrendered to the custody of the Bureau of Prisons ("BOP") on October 7, 2021 to serve his sentence. Mr. Bailey has since been released from BOP custody and is on supervised release. Mr. Bailey has complied with all of the terms of his supervised release. In addition, Mr. Bailey has fully satisfied the restitution and forfeiture obligations arising from this case. Finally, during the period of his pre-trial release Mr. Bailey complied with all terms imposed by pre-trial services.

Mr. Bailey seeks permission to travel to Israel between November 16 and December 2, 2022 to celebrate his grandson's Bar-Mitzvah. Mr. Bailey will be accompanied on the trip by his wife and children.

We respectfully request that the Court allow the requested travel.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Sardar', with a stylized, cursive script.

Michael Sardar

cc: AUSA Dina McLeod (by ECF)  
Probation Officer Kristen K. Maharaj (Kristen\_maharaj@nyep.uscourts.gov)